

Interview Summary: Chad Eros

Chad Eros was interviewed by Jeffrey Leon, Daniel Sheppard, John Mather, and Alexandra Heine on September 15, 2022. Questions about this interview summary should be directed to Ms. Heine.

Text contained in [square brackets] are explanatory notes provided by Commission Counsel to assist the reader.

Please note that in reviewing this witness summary, Mr. Eros provided additional details about the events he described. These have been incorporated into the summary.

Background

Chad Eros is a Chartered Professional Account (“**CPA**”) who currently resides in Saskatchewan.

Mr. Eros was at one point a director of the Freedom 2022 Human Rights and Freedom Not-for-Profit Corporation.

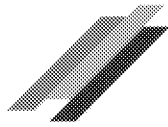
Early Involvement in the Freedom Convoy

Mr. Eros became involved in the Freedom Convoy (“**Convoy**”) through his friend, Chris Garrah.

Mr. Garrah was the founder of the “Adopt-A-Trucker” fundraising campaign. [Mr. Garrah created the Adopt-A-Trucker fundraising campaign on the crowdfunding website GiveSendGo on January 18. Following its creation, the campaign immediately started to raise funds.]

Mr. Eros explained that sometime in January 2022, Mr. Garrah was on a Zoom call with some of the main organizers of the Convoy and the individuals involved in the Convoy’s GoFundMe fundraising campaign, including two women named Helen Gazica and Kristina Kenyon (“**Financial Committee**”). [Tamara Lich created the Freedom Convoy 2022 fundraising campaign on GoFundMe on January 14]. These individuals expressed frustrations about communicating with GoFundMe in an effective way, and Mr. Garrah suggested that they talk to Mr. Eros, as he had experience dealing with financial institutions through his work as a CPA.

Mr. Garrah put Ms. Gazica in contact with Mr. Eros. According to Mr. Eros, he received an email from Ms. Gazica asking him to keep the information he received about the Convoy’s GoFundMe campaign confidential. Mr. Eros agreed.



Involvement in the Fundraising Campaigns

The GoFundMe Disbursement

On or around January 26, Mr. Eros began receiving documents, including an attestation letter setting out an agreement between GoFundMe, Tamara Lich, Ms. Gazica, Ms. Kenyon and Cindy Parker [The attestation letter also listed Noeline Villebrun¹]. He also received the communications from GoFundMe. The Financial Committee asked Mr. Eros to put together a response on an urgent basis because the Convoy had almost arrived in Ottawa and they did not understand the questions that GoFundMe was asking. Mr. Eros put together a response to the questions, which Ms. Kenyon forwarded to Jeffrey Rath, the lawyer assisting them.

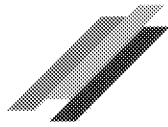
As Mr. Eros explained, Mr. Rath made some edits to his response and sent it to GoFundMe. The next day, on January 27, GoFundMe authorized a \$1 million dollar disbursement of the funds that had been raised through the Convoy.

Mr. Eros advised the Financial Committee that Ms. Lich should not be the recipient of that disbursement, because the optics were bad. He advised them instead that they should create a Not-for-Profit organization and designate that entity as the recipient. To his disappointment, he was advised on or around January 28 that Ms. Kenyon and the other members of the Financial Committee had authorized the GoFundMe disbursement to Ms. Lich's personal account. The money was formally deposited into her account on February 2. Mr. Eros later found out that Ms. Lich had created this account jointly with Chris Barber, one of the other Convoy organizers.

On January 30, Mr. Eros had a meeting with Ms. Lich, Mr. Rath, another lawyer named Russell Heibert, who introduced himself to Mr. Eros as an ex-member of Parliament under Stephen Harper, and a woman named Sandy Sable to push the idea of creating a Not-for-Profit organization so that the rest of the money from GoFundMe could be transferred to it going forward instead of to Ms. Lich's personal account. Mr. Heibert indicated that he could ask a law firm that he knew to create a Not-for-Profit organization within a week. Mr. Eros told Mr. Heibert that one week was too long and that the protests would likely be over by then.

Mr. Eros volunteered to register the organization himself as a Not-for-Profit. The members of the Financial Committee and the Convoy Organizers agreed. [Mr. Eros incorporated the "Freedom 2022 Human Rights and Freedoms" pursuant to the *Canada Not-for-Profit Corporations Act* on January 30. The initial directors of the Corporation were Mr. Eros and Mr. Garrah. Mr. Eros tried to open a bank account at TD Bank on behalf of the

¹ GFM00000037.



Corporation. The Bank rejected his application.] TD Bank did not respond to Mr. Eros' many emails and phone calls regarding opening a bank account.

The GiveSendGo Campaign

On January 31, Mr. Eros had a phone call with a number of individuals about setting up a new fundraising campaign in support of the Convoy. This call was organized after Mr. Eros was contacted by John Ballard, an investor in a US-based social media platform called CloutHub. Mr. Ballard obtained Mr. Eros' phone number from Chris Garrah.

On the call were Mr. Eros, Mr. Ballard, Jeff Brain, the CEO of CloutHub, Jacob Wells, the Co-Founder of GiveSendGo, and James Piloso, an individual associated with the group Taking Back our Freedoms ("**TBOF**"), a Canadian group that was opposed to COVID-19 vaccination mandates. Mr. Eros explained that Mr. Piloso had started calling him the day before, on January 30, because he wanted to be involved in the fundraising and had major donors who did not want to donate unless Mr. Piloso was on the "inside".

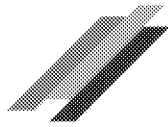
During the call, Mr. Ballard did most of the talking. He presented the idea of creating a separate fundraising campaign on the GiveSendGo platform, which would collect donations while the issue of disbursing the GoFundMe donations was getting sorted out. At the same time, he advocated for the organizers using CloutHub as a platform, and spoke about how it could provide a secure method of communication between organizers. Mr. Brain offered to provide the Convoy organizers with a \$250,000 loan for operating expenses while they were trying to get access to funds raised on crowdfunding platforms.

Mr. Eros found this meeting confusing. He had the impression that the people associated with CloutHub thought that the Convoy movement had a central leadership, and that Mr. Eros was in effect the treasurer for the entire protest movement, which was not accurate. Mr. Eros also did not fully understand why CloutHub was involved at all, when the main substance of the meeting was setting up a new fundraiser on GiveSendGo. Mr. Eros had the impression that Mr. Ballard and Mr. Brain were looking to gain notoriety and positive PR by becoming associated closely with the Convoy.

Mr. Eros was also confused about Mr. Piloso's involvement, since he was organizing meetings without any connection to the original Financial Committee.

Mr. Eros did, however, agree to work with Mr. Wells on establishing a fundraiser on GiveSendGo. He explained that there was an issue with launching the GiveSendGo campaign because the Corporation did not have a bank account. To create a fundraiser on the GiveSendGo platform, users are required to create an account with the platform Stripe, [which is GiveSendGo's main payment processor], and to create a Stripe account, users must have a bank account.

Mr. Eros explained that Mr. Wells offered to use his own pre-existing Stripe account to launch the campaign. He would then transfer the funds to the Corporation once it sorted out the issue of opening a bank account.



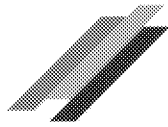
Mr. Eros stated that he agreed and added that at the time, he was working diligently on trying to get a bank account for the Corporation by visiting multiple banks and trying to retain a law firm to draft bylaws for the Corporation. Tim Turple, a lawyer from Saskatchewan, was the main corporate lawyer working on getting an Ontario lawyer onboard, but he indicated to Mr. Eros that no Ontario firm would help with them. Mr. Eros recalled that Mr. Heibert [one of the lawyers assisting the original Financial Committee] indicated that he knew a law firm that would have been willing to assist them with incorporation. Mr. Heibert referred Mr. Eros to Allan Warnock from Alberta, one of the lawyers at this firm, who provided bylaws for the corporation effective February 4. The bylaws were ratified at a meeting on February 7.

The GiveSendGo campaign launched on January 31. On February 2, the GoFundMe campaign was suspended/cancelled. Mr. Eros stated that immediately after this, they observed an immediate and significant increase in donations to the GiveSendGo campaign.

On or around February 6, Mr. Wells worked with Mr. Eros on the phone to create a Canadian Stripe account to replace Mr. Well's US account and start the process of transferring the funds to the Corporation. Mr. Wells was set up with developer privileges on the new Canadian Stripe account, and the organization was set to the Corporation. Stripe Canada kept all the funds that they raised and never gave up control or custody of those funds.

Mr. Eros stated that he did not use his own bank account to set up his Stripe account and that the Corporation also could not use its bank account, because it was unable to set one up. He explained that, on numerous occasions, Mr. Wells asked him to create a Stripe account so that Mr. Wells did not have to use his Stripe account. Mr. Eros continuously explained to him that they could not do so. He then asked lawyers for the Justice Centre for Constitutional Freedoms ("JCCF") [who had become involved in representing the Convoy organizers during the events] if one of them would consider letting the Corporation use one of their trust accounts. Mr. Eros said this suggestion did not seem too far-fetched to him since he had met a paralegal in Ottawa who had offered Mr. Eros the use of her trust account. Keith Wilson, one of the JCCF lawyers, agreed to use his trust account for the Stripe account. Mr. Eros and Mr. Wilson entered into a retainer agreement for that purpose. Mr. Eros added that by that point, the Courts had begun ordering the funds to be frozen and so the issue of the Corporation being unable to get a bank account became moot. [The Attorney General of Ontario's restraint application was granted on February 10, 2022. A *Mareva* injunction over a wider set of assets was granted on February 17, 2022.]

Mr. Eros stated that Mr. Wilson provided Mr. Wells with his wire transfer information and on February 9 a wire transfer for over \$3 million dollars was put in motion from Mr. Wells to Mr. Wilson. On February 10, Mr. Wilson asked Mr. Eros to get Mr. Wells to cancel the wire transfer which Mr. Wells accomplished.



According to Mr. Eros, Stripe Canada started sending him strange emails on February 8. They were asking him for pictures of his inventory so that they could determine whether he was abiding by their Terms and Conditions. He responded that they did not have inventory because it was a fundraiser. Stripe responded that they would no longer provide Mr. Eros with its services.

Mr. Eros explained that despite Stripe's response, donations could still be made through GiveSendGo. However, Stripe prevented them from transferring it into Mr. Wilson's trust account. At this point, Stripe Canada had no legal basis to withhold the funds, yet would still not release them.

Mr. Eros immediately contacted Mr. Wells and told him about his interaction with Stripe Canada. Mr. Wells responded that he did not understand what Stripe was doing. Mr. Wells indicated that he would switch the fundraiser payment processor back to his US Stripe account, settle the funds to his US bank account, and sign a trust agreement to hold the funds until the situation with the Corporation could be sorted out. Mr. Eros signed the agreement and Mr. Wells transferred the GiveSendGo fundraiser back to his own US-based Stripe account on February 11.

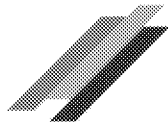
When asked by Commission Counsel whether there were two different Freedom Convoy fundraisers on GiveSendGo – one for each of Mr. Wells' and Mr. Eros' Stripe accounts – or just one fundraiser, Mr. Eros indicated that there was only ever one Freedom Convoy fundraiser on GiveSendGo. He confirmed that Mr. Wells was responsible for changing which Stripe account was associated with this fundraiser.

Mr. Eros emphasized that, although he was involved in the fundraising, he was never the bookkeeper or accountant for the Corporation. There were no financial statements to be produced for a Corporation without assets, without income, and without employees or other expenses. Mr. Eros knows this because he was, for a time, on the Board of Directors as the Treasurer.

The Breakdown in the Relationship Between Tamara Lich and the Financial Committee

The members of the original Financial Committee started complaining to Mr. Eros about Ms. Lich being unreachable since she arrived in Ottawa on or around January 28. He advised Ms. Gazica that she should go to Ottawa to gather the necessary information and documentation from the truckers to begin the process of reimbursing them with the money from the GoFundMe donations, as was promised on the GoFundMe donation page. Mr. Eros stated that he had multiple conversations with the Financial Committee about Ms. Lich and her lack of engagement. Mr. Eros added that Ms. Lich complained to him that Ms. Gazica would not authorize her to use money. It appeared they were fearful of being held responsible for any decisions subsequently made by Ms. Lich with that money.

Mr. Eros explained that he was also having conversations with Ms. Lich at the same time. She told him that she felt as though she was being pulled in too many different directions,



including: (i) by GoFundMe who was trying to dictate how the money should be used, (ii) by the members of the Financial Committee who were figuring out what to do with the money, and (iii) by the truckers who were asking Ms. Lich for the money they felt they were owed, and by the group TBOF.

Mr. Eros' sense was that neither the members of the Financial Committee nor Ms. Lich ever expected to raise as much money as they did or anticipate that the Convoy would become as big as it did. According to him, anxieties were running high, as they were afraid of misusing the GoFundMe donations, which Mr. Eros did not really understand because he had advised them on how to use the money properly by setting up the Corporation.

According to Mr. Eros, the members of the Financial Committee started becoming more and more estranged from Ms. Lich. None of these members of the Financial Committee ultimately became members of the Corporation and none of them were chosen as Directors. Mr. Eros clarified that he was not part of the process of choosing Directors and he did not know who had been chosen until he received correspondence from Mr. Warnock's office, [the lawyer who had written the Corporation's bylaws.]

The January 31 Meeting with the Justice Centre for Constitutional Freedoms Lawyers

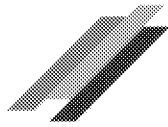
On or around January 31, Ms. Lich advised Mr. Eros that she was meeting with two lawyers from JCCF: Mr. Wilson and Andre Memaury. Mr. Eros understood that they were going to replace Mr. Rath and Mr. Heibert as the lawyers for the Convoy organizers.

Mr. Eros attended the meeting. He recalled that other individuals were present, including Brian Peckford, Ryan Olson and Joseph Bourgault. At first, Mr. Eros did not know who these individuals were. Mr. Wilson introduced himself as the lawyer for Mr. Peckford, who is the former Premier of Newfoundland. Mr. Wilson explained that he was Mr. Peckford's lawyer and that they were suing the government for the COVID-19 public health measures. [Messrs. Olson and Bourgault are part of an organization called Canadians for Truth.]

Mr. Eros described that, during the meeting, Mr. Olson asked Ms. Lich for \$100,000 dollars to reimburse Mr. Bourgault for hotel rooms that he had booked at the ARC Hotel in Ottawa for truckers. Mr. Eros was suspicious of this request because Ms. Lich was complaining about people circling her asking for money and she was anxious about people wanting to spend it improperly.

Travelling to Ottawa

After the February 1 meeting, Mr. Eros called Ms. Lich. She told him that she was feeling overwhelmed because there were lot of people circling her and asking for money. Specifically, in a text message to Mr. Eros, Ms. Lich complained that there were vultures circling her. She also described how she was feeling anxious because people were putting makeup on her and pushing her in front of cameras, which she did not feel comfortable with. She asked Mr. Eros to come to Ottawa. Ms. Lich also asked Mr. Eros if



he could arrange for her husband, Dwayne Lich, to fly out to Ottawa with him. Mr. Eros agreed.

Mr. Eros had arranged to travel to Ottawa via a chartered plane, which he had organized with the JCCF lawyers and a few other individuals, including Mr. Piloso, Dr. Francis Christian [a surgeon who had been reprimanded by the University of Saskatchewan regarding his vaccination status], and a woman who knew Mr. Eros from his hometown of Regina named Tasha Fishman. Mr. Eros explained that he and Ms. Fishman were put in touch by one of Mr. Eros' friends. Ms. Fishman flew out to Ottawa with Mr. Piloso. Both of them were from TBOF.

Mr. Eros arranged for the plane to stop in Medicine Hat to pick up Mr. Lich, which it did.

Mr. Eros was picked up in Regina on February 2. Mr. Lich and the JCCF lawyers were already on the plane. On the flight to Ottawa, Mr. Eros explained that he debriefed Mr. Wilson, Mr. Memaui and another JCCF lawyer Eva Chipiuk on the communications between the Financial Committee and GoFundMe, and his communications with GoFundMe.

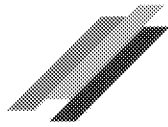
The chartered plane cost a total of \$64,000. The JCCF lawyers asked Ms. Lich to pay for the flight. On February 5, she went to her bank, Toronto Dominion ("TD"), to get a bank draft to pay for it. She was told that her account had been frozen without any explanation. Mr. Eros explained that after this happened, Mr. Turple texted the group in a chat and told Ms. Lich that he would explain what had happened when she returned to the ARC Hotel. Mr. Turple explained that TD had handed the funds over to the Court to decide what to do with them in an interpleader motion. TD alleged that Ms. Lich was using her personal account as a trust account, and that they did not know whose money it was and wanted the Court to decide. Mr. Eros explained that he was frustrated by this, as he had tried to avoid having this happen by advising the Convoy organizers to register the Corporation and to transfer the funds to the Corporation's bank account. TD refused to open the bank account, which left Ms. Lich no choice but to receive the funds into her personal bank account, at which point they were frozen and transferred to the Court.

The chartered plane to Ottawa was ultimately paid for by Mr. Garrah using money raised from the Adopt-A-Trucker campaign.

The Ottawa Protests

The Retainer Agreement

Mr. Eros stated that he had his first in-person meeting with Ms. Lich in her hotel room with the JCCF lawyers on February 3 around 10:00 p.m., after they arrived in Ottawa. He described Ms. Lich as being beside herself and crying for help. She did not appear to him to be the leader of the Convoy.



Mr. Eros recalled that the JCCF lawyers told Ms. Lich that they could help her. They sat down and walked her through the terms of their retainer agreement. Ms. Lich signed the retainer agreement.

Mr. Wilson immediately set up a press conference with Ms. Lich. TBOF was also involved in organizing it.

Mr. Eros described Ms. Lich as panicked about the press conference. She said she had no idea why they were doing this and did not know what she would say. Mr. Wilson told Ms. Lich to follow him out the door and prepare for the press conference. Mr. Eros said he found it off that Mr. Wilson had just met Ms. Lich and that his solution to her complaining about being forced in front of mainstream media was to attend the press conference with her.

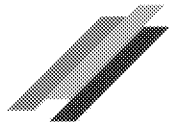
At the press conference, Mr. Wilson announced that he was Ms. Lich's lawyer and described her as the spark that lit the fire and the leader of the Convoy. Mr. Eros was shocked at Mr. Wilson's press conference because Mr. Wilson knew about Ms. Lich's state of mind.

The February 3 GoFundMe Meeting

Later that day, on February 3, Mr. Eros, Ms. Lich, Mr. Lich, and the JCCF lawyers had a conference call with GoFundMe in a boardroom at the ARC Hotel. Mr. Eros explained that the JCCF lawyers and specifically Mr. Wilson were trying to take over the meeting and assert themselves as the spokespeople on the financial side of the Convoy. The representative from GoFundMe who attended the meeting said that he would rather speak Mr. Eros than Mr. Wilson because he needed answers to a series of technical questions about the distribution of the money from the GoFundMe donations.

Mr. Eros had to take the lead at the meeting. He explained that his plan was to forge a relationship with the corporate side of TD in order to set up a cash management service similar to payroll so that the funds could be electronically distributed to the truckers, in the same manner that employees are paid directly into their bank accounts by their employer through payroll. Mr. Eros stated he had commercial banking experience. The GoFundMe representative agreed with Mr. Eros' approach; however, his plan never came to fruition because of the interpleader motion.

Mr. Eros explained that while they were in the meeting with GoFundMe, James Piloso, the individual associated with TBOF, was causing a scene outside the boardroom. Mr. Eros stated that he was furiously pacing back and forth and angrily exclaiming that the boardroom belonged to TBOF and that TBOF was in charge of the protest. Mr. Eros explained that he and Mr. Memauri went outside to calm him down. Mr. Piloso stated that the whole Convoy was TBOF's idea, that Ms. Lich was under TBOF leadership, and that they should not be excluded from any financial conversations with GoFundMe. Mr. Eros calmed him down by saying they were having a boring meeting about banking.



Concerns about the Taking Back Our Freedoms Group

Ms. Lich began complaining to Mr. Eros about the TBOF people as early as February 1.

After the GoFundMe meeting on February 3, Ms. Lich re-iterated to Mr. Eros that the TBOF people were the ones that had been pushing her in front of camera and approaching her for the GoFundMe donations. Mr. Eros googled them and found out that Mr. Peckford was the Chairman of TBOF's Board of Directors. [Mr. Rath is also on the Board of Directors of this organization.]

Mr. Eros confronted Mr. Wilson on or around February 4 and asked him to explain why TBOF was heavily involved despite Ms. Lich being concerned about them. He also asked how Mr. Wilson could be representing both Mr. Peckford and Ms. Lich at the same time, since it seemed that they had diverging interests.

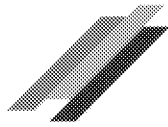
Mr. Wilson responded that Mr. Peckford is only a figure head for TBOF to make the organization appear more legitimate. He said Mr. Peckford probably did not even know that he was the Chairman of the Board and suggested that TBOF were bad actors. This explanation, Mr. Eros said, made no sense to him.

Mr. Eros started noticing that TBOF was taking up a lot of Ms. Lich's time, which explained why she was not returning the Financial Committee's phone calls. He also sensed that the Financial Committee did not agree with TBOF's approach, which may have caused the breakdown in the relationship between them and Ms. Lich.

On or around February 5, Ms. Lich asked Mr. Eros whether he wanted to join a meeting of the Trucker Captains, which was happening down the hall from him at the ARC Hotel. He agreed, but when he entered the room, he saw that many individuals from TBOF were present.

Mr. Eros explained that he immediately went to tell Ms. Lich and her husband not to go to the meeting because there were multiple TBOF people there. He then confronted Mr. Wilson and asked him to explain why TBOF people were there given that he had implied they were bad actors and manipulators. Mr. Wilson responded that he did not know why they were there or what was happening. Mr. Eros' view was that Mr. Wilson was shaken up by their confrontation.

Mr. Eros also stated that it became clear to him that there were two factions within the Convoy organizers: the GoFundMe Convoy fundraising campaign group, which included TBOF, Ms. Lich, Mr. Barber, and the JCCF lawyers, and the Adopt-A-Trucker group, which included Mr. Garrah. The ARC Hotel was the designated "headquarters" for the GoFundMe group, while the Swiss Hotel was the designated "headquarters" for the Adopt-A-Trucker group. According to Mr. Eros, the police knew about these headquarters during the entirety of the Ottawa protests.



Mr. Eros explained that Ms. Lich was persistently being called into meetings at the ARC Hotel by TBOF representatives, Mr. Wilson and the trucker captains. He was not invited to those meetings and was not staying at the ARC Hotel himself. Mr. Garrah had arranged for Mr. Eros to stay in a condo that an Ottawa resident had offered as accommodations.

Fundraising and Distribution of Money Amongst the Ottawa Protesters

Mr. Eros explained that the protesters were funding themselves on the ground in Ottawa through cash donations and e-transfers. He described how tents were erected throughout the downtown core and became hubs where protesters would pool cash and receive donations to buy food and fuel at the Coventry Road baseball diamond and a farm field.

Mr. Eros heard a lot of protesters complaining about where the money was going and who was in charge of managing the funds, because cash was just being dropped off on tables and there was no organized way to store and distribute it.

Mr. Eros also described how there was a sign beside the main stage in the downtown core asking people to donate cash into a water jug for the Adopt-A-Trucker campaign; however, Mr. Garrah had no knowledge of who started this fundraiser. Mr. Eros described individuals bringing the jug full of cash to the Swiss Hotel sometime around February 11 or 12, and asking what they should do with it.

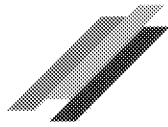
Mr. Eros tried to advise the individuals who were handling the cash that they should print off bank forms and count the money to ensure that it was accounted for, and properly distributed out to the truckers who the fundraising was for.

A system was put into place whereby the money was placed into numbered envelopes and the individuals who were taking those envelopes to go distribute the money to the truckers had to sign them out, record the amount in the envelope, and record the name and license plate of the trucker they gave money to as well as the amount of money that was given. They then had to come back to provide proof that the money had been distributed. This system, Mr. Eros explained, ensured that the money was being fairly and evenly distributed to the truckers.

Danny Bulford's partner, Piper Bulford, was tracking the donations on a spreadsheet. Mr. Eros estimated that approximately \$20,000 was being distributed every day on average. The envelopes distributed from the Swiss Hotel contained \$500 each.

Mr. Eros also described how money was also being distributed out of the ARC Hotel. He was not sure how the TBOF group was getting money, but recalled that he heard that donors and protesters were dropping off cash donations at the ARC. His understanding that the TBOF group was distributing envelopes of money as well, but in \$2,000 amounts.

Mr. Eros clarified that the Corporation was never the recipient of the "on the ground" cash donations.



Cryptocurrency

Mr. Eros stated that he had very little knowledge of the cryptocurrency fundraising project. He explained that Mr. Wilson told him on or around February 11 that Benjamin Dichter, another Convoy organizer, was doing a cryptocurrency fundraiser. Mr. Wilson asked Mr. Eros to inquire with Mr. Dichter about who he was raising that money for. Mr. Dichter told Mr. Eros that he was raising the funds for the Convoy. Mr. Eros asked Mr. Dichter whether he would hand over the keys to the four wallets that contained the cryptocurrency to the Directors of the Non-Profit Corporation [the “keys” to cryptocurrency “wallets” were the codes necessary to access and move the cryptocurrencies that had been raised]. Mr. Dichter said yes; however, to Mr. Eros’ knowledge, the keys were never handed over.

This was the extent of Mr. Eros’ cryptocurrency involvement.

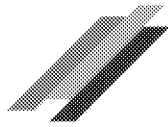
Tamara Lich’s Negotiations with the Mayor of Ottawa

In Mr. Eros’ view, the culmination of the pressure and anxiety that Ms. Lich was feeling throughout the Convoy became clear to everyone after the negotiations between the Mayor of the City of Ottawa, Jim Watson, and Mr. Wilson and Dean French. These are the negotiations that resulted in the agreement between Ms. Lich and the Mayor to move trucks that were parked in residential neighborhoods.

After the agreement was reported by the media, a tweet went out from Ms. Lich’s Twitter page denying the existence of that agreement. There was a lot of commotion around the tweet. Mr. Eros described how this caused Ms. Lich to have what he described as a nervous breakdown. She collapsed in the snow and cried and said she could not do this anymore.

Mr. Eros met up with Mr. Wilson and Ms. Chipiuk who were in a panic and speaking to Mr. Dichter. They explained that a major reporter had retweeted Ms. Lich’s tweet denying the existence of the agreement. This caused a lot of confusion and panic.

Mr. Eros later found out that it was Mr. Dichter who had written and posted that tweet from Ms. Lich’s account. When Mr. Eros confronted Mr. Dichter, he explained that he did not believe an agreement had been reached. Mr. Dichter explained that Mr. French was Premier Doug Ford’s right-hand man and that he believed they had negotiated the agreement to gather all the trucks in one place, thereby making it easier for the police to remove them. Mr. Eros explained that Mr. Dichter fundamentally disagreed with the agreement between Ms. Lich and the Mayor, and he thought Mr. Wilson had overreached as a lawyer by spearheading such negotiations. Mr. Dichter ultimately felt that he was correct about the Mayor’s motivation, which was to gather the trucks in one place to make it easier for the police to move them.



The "Shut Down the Border" Proposition

On February 10, a man named Karl Duville, a leader of the Coventry Road camp, called Mr. Eros and told him that a very wealthy and important businessman wanted to have a meeting with the Swiss Hotel leaders regarding a large donation. Mr. Eros agreed. The trucker captains, all the Coventry Road camp leaders, Mr. Wilson, and some volunteers were in attendance. The businessman only spoke French and required an interpreter. He proposed donating \$500,000 in fuel in exchange for his brand to be all over the protest. He also wanted the Convoy organizers to order the truckers to blockade the Canadian borders and bring the government down to its knees.

Mr. Eros spoke up and indicated that the Convoy was a protest and that he did not want anything to do with that. Mr. Wilson agreed. One of the other leaders of the Coventry Road camp, Mike Clark, was insulted by the businessman's proposal. He said that he was proposing to use the truckers in an act of war and that he could go to jail or worse. They collectively told the businessman that they had nothing to do with border blockades and wanted nothing to do with them, and that those blockades were completely separate from the Ottawa protest.

Mr. Eros said that they all got the feeling that the businessman was an agent provocateur or a government plant because his proposal was so ridiculous and incriminating. Mr. Eros never heard from or saw the businessman again.

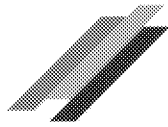
Engagement with Other Convoy Leaders or Organizers in Ottawa

The Convoy Organizers' Relationship with Patrick King

Mr. Eros explained that GoFundMe specifically asked the original Financial Committee and Convoy organizers to include a disavowal of Pat King on their fundraising page. The organizers did so, which Mr. Eros thought was odd because it called attention to Mr. King's involvement. Mr. Eros' personal view was that if Mr. King was a bad actor, his name should be removed from the GoFundMe page, which eventually happened. At the time, Mr. Eros had no idea who Mr. King was.

Mr. Eros recalled that when they were in Ottawa, a few of the Convoy organizers and trucker captains expressed concerns about Mr. King. Others were not concerned and felt that he was a legitimate part of the protest. Mr. Eros clarified that overall, the Mr. King controversy was not a big topic of discussion. His view was that Ms. Lich and Mr. Barber definitely wanted to distance themselves from him. Mr. Eros later found out that Mr. King and Mr. Barber had a falling out on their way to Ottawa because Mr. Barber had gone against Mr. King's advice regarding the movement of the Convoy, which led to trucks getting stuck and getting into accidents. Mr. Barber became embarrassed about this. Ms. Lich yelled at Mr. King during the episode.

Mr. King was in Ottawa before Mr. Eros. Mr. Eros explained that he did not meet Mr. King for the first week of the protest. One night, Mr. Eros went to the Swiss Hotel and saw that



Mr. King was sitting down with Mr. Garrah and the other organizers. Mr. Eros was confused by this because he thought they were going to distance themselves from him. Mr. Eros then found out that, despite what he had heard from some of the organizers, Mr. King had been involved in the Convoy from the very beginning. It appeared to Mr. King as though Ms. Lich had her own followers and Mr. King had his own followers, but they worked together and supported each other. Ms. Lich, it appeared, had only distanced herself from him because they were being pressured to do so by GoFundMe.

Mr. Garrah told Mr. Eros that he was sympathetic to Mr. King because without him, he would not have known about the Convoy. Mr. Eros stated that, as a friend, he told Mr. Garrah to be cautious because Mr. King was a controversial figure. Mr. Garrah was convinced that Mr. King should not be harshly judged and explained that his focus was to be a good humanitarian and to focus on loving and accepting everyone, including Mr. King. Mr. Garrah explained that he did not care about political strategy or about who he should and should not be aligning himself with. Mr. Eros added that Mr. Garrah played more of a clergyman roll.

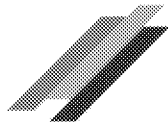
Mr. Eros explained that he had one in-person interaction with Mr. King while in Ottawa. Mr. Eros described how there was a buzz going on inside the Swiss Hotel about the new Convoy cryptocurrency that it was being marketed by Mr. King [this was the "Freedom Convoy Token"]. A man named Owen Swiderski sent him a message on Signal about it and asked for a meeting. Mr. Eros met him and listened to his pitch about the new cryptocurrency. After the meeting, Mr. Eros did not give the cryptocurrency idea much thought until volunteers interested in investing asked Mr. Eros to come to the Swiss dining area to talk to a few men who were peddling the cryptocurrency. Mr. Eros met these individuals and asked them questions. They could not answer Mr. Eros' questions and so the investors who were present said they would not be investing.

Mr. King heard about this interaction and went to the Swiss Hotel with Mr. Swiderski and George Billings to confront Mr. Eros while he was eating dinner. According to Mr. Eros, Mr. King, Mr. Swiderski and Mr. Billings looked like they wanted to beat him up.

Mr. Eros pushed some chairs aside and told Mr. Garrah, who was also present, to call the police. Mr. Eros managed to de-escalate the situation and no altercation happened. Mr. King apologized.

The Convoy Organizers' Relationship with James Bauder

Mr. Eros stated that Mr. Bauder became involved in the Convoy early on, before his own involvement. He recalled being told that Mr. Bauder had attended a Zoom meeting with the Convoy organizers sometime in January. After that meeting, the organizers agreed to distance themselves from him because he had made some alarming comments and was a loose cannon.



Ms. Lich asked Mr. Garrah to replace Mr. Bauder as the person who would be on the ground in Ottawa managing logistics when the trucker convoy started arriving. Mr. Garrah coordinated with the police until Danny Bulford took over this role later during the events.

Engagement with Other Convoy Leaders or Organizers at the Ports of Entry

Mr. Eros stated that he did not have any communication with the leaders, organizers, or participants of the port of entry protests. He heard about them on the news and from word of mouth.

The Impact of the *Emergencies Act*

Mr. Eros' RBC account was frozen on or around February 17, after the *Emergencies Act* was invoked. He said this impacted his ability to buy food for his family. His wife called RBC and they arranged for a separate account to be opened for her. The RBC employee explained to him on the phone that they had been ordered to freeze his account by the police. His account was unfrozen a five days later. The senior manager told Mr. Eros that he could ask the police to unfreeze his accounts when he left Ottawa. Mr. Eros told the representative that he was not in Ottawa anymore. He received the call while he was in Arnprior.

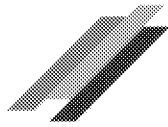
Conexus Credit Union then called Mr. Eros while he was in Arnprior and told him they could not offer him any financial services. Mr. Eros' mortgage is with Conexus. They told him that the police had said Mr. Eros was a "designated person" that participated in illegal blockades, which was why his bank account was frozen. Mr. Eros recorded this conversation.

Mr. Eros later found out that the police had distributed his name and a photograph of him to every bank, credit union, and investment firm in Canada. He described this as very disheartening because he got involved in the Convoy to bring legitimacy to the fundraising aspect and to ensure that everything was done by the book.

As a CPA, Mr. Eros feels blacklisted from financial institutions. He stated that although he has not tried to apply for a job at a financial institution since the Convoy, his involvement and the subsequent *Emergencies Act* measures that were used against him will impact his job prospects and career. Mr. Eros explained that the regulatory body that governs CPAs received complaints about his involvement in the Convoy. The regulatory body told him that they would not act on the complaints, but warned Mr. Eros to be professional.

The Pre-Existing Relationship Between the Convoy Organizers and JCCF Lawyers

Mr. Eros explained that after the Convoy events, he found out that some of the Convoy organizers, such as Ms. Lich and Mr. King, and one of the JCCF lawyers, Mr. Wilson, knew each other from being involved in Alberta sovereigntist movements. When they, and specifically Mr. Wilson, started taking over the narrative at the protests in Ottawa, things changed. Mr. Eros said this was unfortunate because he witnessed thousands of



protesters who were completely oblivious to the dynamics of the Alberta sovereigntist group and the dominance of this group's narrative. They did not know that the narrative could delegitimize a protest against government imposed COVID-19 public health measures.

Mr. Eros stated that when he started asking questions about this group's origin story, he was completely ostracized.